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 Richard V. Singleton  
 Alan M. Weigel

UNITED STATES DISTRICT COURT  
 SOUTHERN DISTRICT OF NEW YORK

-----X	ECF CASE
MICHAEL STEPSKI, KIRSTEN STEPSKI, Wife,	:
GEAL RODERICK and BENJAMIN SCHOBER,	:
	:
Plaintiffs,	:
	:
-against-	:
	:
The M/V NORASIA ALYA, her owners,	:
operators, etc., and MS "ALENA"	:
SCHIFFFAHRTSGESELLSCHAFT mbH & CO. KG,	:
PETER DOEHLE SCHIFFFAHARTS-KG,	:
	:
Defendants.	:
-----X	

06 CV 01694 (CM)

**AFFIDAVIT OF  
 RICHARD SINGLETON,  
 ESQ. IN SUPPORT OF  
 DEFENDANTS' MOTION  
 TO STRIKE PLAINTIFFS'  
 EXPERT'S IMPROPER  
 SUPPLEMENTAL  
 REPORT AND  
 PRECLUDE HIS  
 TESTIMONY**

STATE OF NEW YORK            )  
   )       ss:  
 COUNTY OF NEW YORK        )

RICHARD V. SINGLETON, being duly sworn, deposes states as follows:

1. Deponent is a member of the firm of Blank Rome LLP, attorneys for Defendants MS "ALENA" Schiffahrts GmbH & Co. KG and Peter Doehle Schiffaharts-KG, owner and manager of M/V NORASIA ALYA ("NORASIA ALYA") and is admitted to the bar of this honorable court. I am fully familiar with and have personal knowledge of the matters stated herein.

2. Deponent submits this Affidavit in support of Defendants' motion for an Order striking the report of Plaintiffs' maritime expert, Captain Joseph Ahlstrom, dated February 10, 2010, and precluding Captain Ahlstrom from testifying on the opinions stated in the report.

3. Attached hereto as Exhibit "A" is a true and correct copy of a "Consent Scheduling Order" dated June 16, 2006 setting March 2, 2007 as the deadline for the completion of all discovery.

4. Attached hereto as Exhibit "B" is a true and correct copy of the Court's order setting August 20, 2008 as the final deadline for the submission of the last expert report.

5. Attached hereto as Exhibit "C" is a true and correct copy of Captain Joseph Ahlstrom's written report containing his conclusions and opinions dated February 5, 2008.

6. Attached hereto as Exhibit "D" is a true and correct copy of the transcript of Captain Ahlstrom's deposition dated March 14, 2008.

7. Attached hereto as Exhibit "E" is a true and correct copy of Captain Ahlstrom's report dated February 10, 2010.

**WHEREFORE**, your deponent respectfully requests that the Court enter an Order striking Captain Ahlstrom's February 10 report and precluding him from testifying in the trial of this matter on the opinions stated in the report.



Richard V. Singleton

Sworn to before me this  
24 day of February 2010

  
NOTARY PUBLIC

KARL V. REDA  
Notary Public, State of New York  
No. 30-4783126, Qual. in Nassau Cty.  
Certificate Filed in New York County  
Commission Expires Nov. 30, 2013